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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA)

Plaintiff,)

v.)

BARON LOMBARDO et al)

Defendants.)

Case No. 02: 07 CR 286 PGC

**MOTION TO UNSEAL THE
INDICTMENT**

The United States of America, through the undersigned Assistant United States Attorney, hereby moves the Court, pursuant to Fed.R. Crim.P. 6(e)(4), and DUCrimR 49-2(a) for an order unsealing the Indictment in this case. The United States requested that the indictment be sealed was based on the need to secure the assets included in the forfeiture allegation in the indictment. All such assets have been secured or are in the process of being secured. Secrecy is no longer required to avoid wasting or secreting of forfeitable assets.

Furthermore, all of the defendants have either been arrested or are will self surrender to the United States District Court for the District of Las Vegas shortly. Therefore, the circumstances justifying the sealing of the indictment have changed and the United States requests that the Indictment be unsealed.

Respectfully submitted this 11th day of May, 2007.

BRETT L. TOLMAN
United States Attorney

A handwritten signature in black ink, appearing to read 'D. Washburn', with a long horizontal line extending to the right.

D. LOREN WASHBURN
Assistant United States Attorney